

1. This Court has jurisdiction under the provisions of 28 U.S.C. Section 1332; in that the plaintiff DBA DISTRIBUTION SERVICES, INC. d/b/a DISTRIBUTION BY AIR, is a CORPORATION organized under and domiciled in the State of New Jersey with its offices located at 701 Cottontail Lane, Somerset, New Jersey 08875;

2. Upon information and belief, defendant MSL PRODUCTIONS, LLC, hereinafter "MSL PRODUCTIONS") is a limited liability company organized under the laws of the State of New York with a place of business in the city and state of New York.

3. Upon information and belief, defendant MSL SPORTS AND ENTERTAINMENT, LLC ("MSL SPORTS") is a limited liability company organized under the laws of the State of New York with a place of business in the city and state of New York.

4. Upon information and belief, defendant JACK RUSSELL GROUP is a business entity with a principal place of business in the city and state of New York.

JURISDICTION AND VENUE

respectfully alleges:

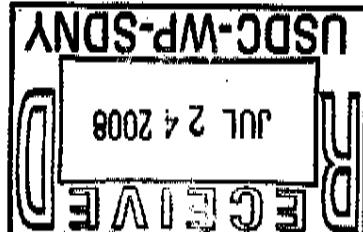
Plaintiff by its attorney, DAVID COHEN, complaining of the dependencies

JUDGE DANIELS

MSI, PRODUCTIONS, LLC, MSL SPORTS
AND ENTERTAINMENT, LLC, MSL SPORTS
and JACK RUSSELL GROUP.
Defendant(s).

08
COMPLAINT
CV. 6574

DBA DISTRIBUTION SERVICES, INC. d/b/a
DISTRIBUTION BY AIR



13. No portion of the outstanding amount has been paid by any of the parties to work out the payment of the outstanding amounts.
12. Subsequently, on or about December 17, 2007, MSL SPORTS reiterated its outstanding billing should be rebilled to MSL SPORTS as consulting services.
- GROUP, that MSL PRODUCTIONS had insufficient funds at that time, and that the MSL PRODUCTIONS or its business had been transferred to or acquired by JACK RUSSELL GROUP, that MSL PRODUCTIONS had insufficient funds at that time, and that the MSL PRODUCTIONS or its business had been transferred to or acquired by JACK RUSSELL
11. On or about October 1, 2007 Plaintiff was advised by MSL SPORTS that paragraphs 1 through 9 as though fully set forth herein.
10. Plaintiff repeats and reiterates each and every allegation set forth in paragraphs 1 through 9 as though fully set forth herein.

SECOND CAUSE OF ACTION

9. Defendant MSL PRODUCTIONS owes Plaintiff the sum of \$218,077.14, according to the account hereunto annexed as Exhibit A.
8. On, about and between January 12, 2007 and October 15, 2007 Plaintiff performed numerous transportation shipments at the specific request of MSL PRODUCTIONS for the agreed and total amount of outstanding billing of \$ 218,077.14
7. At all times hereinafter mentioned, Plaintiff was and still is a domestic and international freight forwarding organization engaged in the expedited transportation of shipments throughout the United States and worldwide.

FIRST CAUSE OF ACTION

6. Venue is proper in the Southern District of New York in that all defendants are located in the District.
5. The amount in controversy exceeds the sum or value of seventy-five thousand dollars, exclusive of interest and costs.

(518) 784-5358
Neverill, New York 12130
19 East Shore Drive PO Box 299
d/b/a DISTRIBUTION BY AIR.
DBA DISTRIBUTION SERVICES, INC.
Attorney for Plaintiff
DAVID COHEN ESG. (DC-2331)



Dated: New York, New York
July 18, 2008

of this action and such other relief as this Court may deem appropriate.

RUSSELL GROUP in the sum of \$ 218,077.14 with interest, plus the costs and disbursements

PRODUCTIONS, LLC, MSL SPORTS AND ENTERTAINMENT, LLC and JACK

WHEREFORE, Plaintiff demands judgment against defendants MSL

Plaintiff for payment of the outstanding amount of \$ 218,077.14

18. Based upon the foregoing, JACK RUSSELL GROUP is liable to

transferred property.

Law Plaintiff may have such conveyance set aside, disregard the conveyance, or levy upon the

17. Pursuant to the provisions of the New York Debtor and Creditor

conveyance.

RUSSELL GROUP rendered MSL PRODUCTIONS insolvent and is a fraudulent

16. Upon information and belief the conveyance of assets to JACK

paragraphs 1 through 14 as though fully set forth herein.

15. Plaintiff repeats and reiterates each and every allegation set forth in

THIRD CAUSE OF ACTION

the outstanding amount of \$ 218,077.14 to the Plaintiff.

14. By reason of the foregoing MSL SPORTS is liable for the payment of

defendants to Plaintiff.

Sent By: home;

518 784-5358;

Jul-26-08 3:14PM;

Page 4

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11 0 11 181 HX9

Page: 1

Date: 06/20/08	Customer Aging Detail By Name	Time: 12:12:06:57	DISTRIBUTION BY AIR	Age by: Inv Date	Aging Date: 06/20/08	EMR65848 - MSL PRODUCTIONS CONN: BRUCE EXT 241 SLS: HARWR
848.49	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1495568
2,620.93	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1465475
2,576.39	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1495474
2,951.13	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1495568
1,890.30	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1495569
718.54	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1465473
393.37	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1495471
205.24	01/12/07	01/23/07	01/13/07	01/19/07	01/19/07	1432821
450.00	02/05/07	02/05/07	02/05/07	02/05/07	02/05/07	1491451
225.00	02/07/07	02/07/07	02/07/07	02/07/07	02/07/07	1464827
1,800.00	02/07/07	02/07/07	02/07/07	02/07/07	02/07/07	1495488
1,624.05	02/08/07	02/08/07	02/08/07	02/08/07	02/08/07	1464826
245.00	02/14/07	02/14/07	02/14/07	02/14/07	02/14/07	144631
87.75	02/14/07	02/14/07	02/14/07	02/14/07	02/14/07	144864
1,550.00	02/14/07	02/14/07	02/14/07	02/14/07	02/14/07	1479490
1,137.75	02/15/07	02/15/07	02/15/07	02/15/07	02/15/07	144750
545.69	02/16/07	02/16/07	02/16/07	02/16/07	02/16/07	1479456
5,700.00	02/16/07	02/16/07	02/16/07	02/16/07	02/16/07	1495678
2,745.74	02/17/07	02/17/07	02/17/07	02/17/07	02/17/07	1495700
5,700.00	02/17/07	02/17/07	02/17/07	02/17/07	02/17/07	1495691
5,700.00	02/18/07	02/18/07	02/18/07	02/18/07	02/18/07	1479471
375.35	02/23/07	02/23/07	02/23/07	02/23/07	02/23/07	1479472
616.07	02/23/07	02/23/07	02/23/07	02/23/07	02/23/07	145740
290.00	02/23/07	02/23/07	02/23/07	02/23/07	02/23/07	144752
616.24	02/23/07	02/23/07	02/23/07	02/23/07	02/23/07	1495732
296.24	02/26/07	02/26/07	02/26/07	02/26/07	02/26/07	1495732
2,877.02	02/26/07	02/26/07	02/26/07	02/26/07	02/26/07	1495751
306.51	02/27/07	02/27/07	02/27/07	02/27/07	02/27/07	1495751A
957.73	02/28/07	02/28/07	02/28/07	02/28/07	02/28/07	1495751B
8,150.00	02/28/07	02/28/07	02/28/07	02/28/07	02/28/07	1479480
156.14	03/01/07	03/01/07	03/01/07	03/01/07	03/01/07	102599A
306.45	03/02/07	03/02/07	03/02/07	03/02/07	03/02/07	1479481
786.20	03/02/07	03/02/07	03/02/07	03/02/07	03/02/07	1479482
227.60	03/02/07	03/02/07	03/02/07	03/02/07	03/02/07	1479482
425.00	03/03/07	03/03/07	03/03/07	03/03/07	03/03/07	1495996

INVOICE
INV DATE 1-30 Days 31-60 Days 61-90 Days Over 90 Days
EMR65848 - MSL PRODUCTIONS CONN: BRUCE EXT 241 SLS: HARWR
Phone:

Time: 12:12:06:57
Customer Aging Detail By Name
Date: 06/20/08
Page: 1

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Customer Aging Detail By Name

313.98	03/08/07	146682
1, 300.00	03/09/07	1495961
178.39	03/09/07	147284
870.88	03/10/07	147410
1, 700.00	03/13/07	1495968
1, 375.00	03/15/07	1495971
2, 349.75	03/16/07	1493965
146.25	03/21/07	1493932
267.83	03/19/07	1493909
498.26	03/23/07	1434380
4, 775.00	03/24/07	1493964
492.75	03/27/07	1493987
17.55	03/27/07	1494114
1, 850.00	03/29/07	1494109
1, 024.82	03/29/07	1494109A
4, 150.00	03/30/07	1494113
3, 700.00	03/30/07	1494116
1, 150.00	04/02/07	1494119
844.88	04/04/07	1493944
1, 550.00	04/10/07	1494164
243.91	04/11/07	150848
2, 025.00	04/15/07	150900
146.80	04/16/07	1494296
2, 850.00	04/19/07	1494214
1, 100.00	04/23/07	1494236
1, 675.00	04/25/07	1494246
297.50	04/27/07	158772
1, 486.45	04/27/07	1495536
450.10	05/01/07	1495538
975.00	05/05/07	1494555
2, 859.95	05/05/07	1494555
1, 540.22	05/07/07	1494553
261.56	05/10/07	1494553
2, 925.00	05/10/07	1494553
544.91	05/11/07	1494553
2, 925.00	05/11/07	1494553
410.12	05/13/07	1529444A
164.32	05/14/07	1513145
275.00	05/15/07	149947
2, 841.33	05/19/07	1515158
1, 350.00	05/21/07	1515158
8, 325.00	05/21/07	1507524
177.01	05/22/07	1515197
204.68	05/22/07	1515197

Date: 06/20/08 Customer Agging Detail By Name
Time: 12:26:57 Distribution BY AIR
Page: 2 Agging Date: 06/20/08
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Inv Date-30 Days 31-60 Days 61-90 Days Over 90 Days

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Customer Aging Detail By Name

Date: 06/20/08 Customer Aging Detail By Name
Title: 12:26:57 DISTRIBUTION BY AIR
Page: 3 Aging by: Inv Date
Aging Date: 06/20/08

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Customer Aging Detail By Name

Invoice		Inv Date1-30 Days	31-60 Days	61-90 Days	Over 90 Days	Total	Phone	Aging Totals:
1530610A	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1507550	166804	167887
1530610B	09/04/07	09/06/07	09/10/07	09/12/07	09/15/07	1535507	1475010	1480055
1530610C	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1508691	1508700	1509170
1530610D	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530924Z	170811Z	1730796Z
1530610E	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530923Z	169487Z	1530924Z
1530610F	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530925Z	172889Z	172895Z
1530610G	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530926Z	175289Z	22,608.63
1530610H	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530927Z	169487Z	218,086.14
1530610I	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530928Z	17289Z	218,077.14
1530610J	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530929Z	175289Z	22,608.63
1530610K	09/04/07	09/06/07	09/10/07	09/13/07	09/15/07	1530930Z	175289Z	218,086.14